

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

IN RE:)
)
ROBERTS, WILLIAM BARRIER) CASE NO. 18-83442-CRJ11
SSN: XXX-XX-9314) CHAPTER 11
)
Debtor.)

APPLICATION TO EMPLOY PROFESSIONAL

COMES NOW, the debtor, William B. Roberts ("Debtor"), and applies to this Court to employ the law firm of Callahan PC ("Special Counsel"), as Special Counsel for the Debtor and states as grounds as follows:

1. On November 16, 2018, the Debtor filed a Voluntary Petition for Relief under Chapter 11 of the Bankruptcy Code.
2. Since the Petition Date, the Debtor has operated as a Debtor in Possession pursuant to § 1107 and § 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this matter.
3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157.
4. This application is made pursuant to § 327 of the Bankruptcy Code and Rule 2014 of the Federal Rules of Bankruptcy Procedure.
5. The Debtor needs legal services to aid in representation of the Debtor in oppression litigation concerning his interest in Bullet and Barrel, LLC against its controlling member/sole Management Committee Member/President to be filed as an adversary proceeding. The Debtor desires to employ Special Counsel for these purposes on behalf of the Debtor. The Debtor intends

to pay Special Counsel for its services at its normal hourly rate in the amounts provided for in the Affidavit of John J. Callahan, Jr., Esq., which is attached hereto and incorporated herein as Exhibit A. The Debtor proposes to pay Special Counsel from operating funds subject to approval by the Court.

6. The Debtor is not aware of any interest in which Special Counsel would be averse to the estate in the matters upon which Special Counsel is to be engaged, and believes that Special Counsel is a "disinterested person" as defined under the Code. Further, the Debtor is not aware of any connection that Special Counsel would have with the Debtor, its creditors, or other parties of any interest, including the Bankruptcy Administrator's Office, or any employee of the Bankruptcy Administrator's Office in this District.

WHEREFORE, the Debtor requests that this Court authorize the employment of Callahan PC, for the purposes provided for in this application.

DATED this the February 4, 2019.

/s/William B. Roberts

WILLIAM BARRIER ROBERTS

/s/ Stuart M. Maples

STUART M. MAPLES

MAPLES LAW FIRM, PC
200 Clinton Avenue West, Suite 1000
Huntsville, Alabama 35801
(256) 489-9779 – Telephone
(256) 489-9720 – Facsimile
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CERTIFICATE OF SERVICE

I do hereby certify that on February 4, 2019, a copy of the foregoing document was served on the following by Electronic Case Filing a copy of the same.

Richard Blythe
Bankruptcy Administrator
richard_blythe@alnb.uscourts.gov

All parties requesting notice via ECF

Via U.S. Mail to all creditors on matrix

/s/ Stuart M. Maples

STUART M. MAPLES

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AFFIDAVIT

COMES NOW, John J. Callahan, Jr., Esq., in support of the Application to Employ filed by the Debtor in this action, and after being duly sworn, does depose and says as follows:

1. My name is John J. Callahan, Jr. I am an attorney practicing law as the shareholder of Callahan, PC ("the firm"), and doing business at 301 Washington Street, Suite 301, Huntsville, Alabama, 35801.

2. The Debtor desires to employ the firm at its standard rates which are as follows: \$295 per hour for John J. Callahan, Jr. (shareholder) and \$245 per hour for Lisa M. English (of counsel). The Debtor had engaged the firm at such rates to represent him in addressing the dispute concerning his interest in Bullet & Barrel, LLC with its controlling member/sole Management Committee Member/President, which the firm has continued to undertake in cooperation with Debtor's counsel of record, Stuart Maples.

3. To the best of my knowledge, Lisa English and I, being the two attorneys in the firm, are "disinterested person(s)" in the above Chapter 11 case, and neither we nor the firm represent or hold any interest adverse to the estate in the matters on which the firm is engaged.

4. To the best of my knowledge, Lisa English and I, and the firm have no connection with the Debtor, its creditors, or any parties in interest.

5. The firm is willing to represent the Debtor at its standard rates as set forth in paragraph 2 above. The firm understands that the allowance of fees and expenses is subject to Court approval.

6. I have reviewed the application filed by the Debtor, and all the facts stated therein are true and correct.

7. I have personal knowledge of the matters stated herein.

DATED January 31, 2019.



John J. Callahan, Jr.

STATE OF ALABAMA)

)

COUNTY OF MADISON)

)

I, the undersigned authority, in and for said County and State, hereby certify that John J. Callahan, Jr., whose name is signed to the foregoing Affidavit and who is known to me, acknowledged before me on this day that, being informed of the contents of the aforesigned Affidavit he executed the same voluntarily on the day the same bears date.

GIVEN unto my hand and official seal, this the 31st day of January, 2019.





Notary Public

My Commission Expires: 11/7/22